

DEC 24 1991

Aluminum Company of America
Attn: Jim Saxton
Environmental Supervisor
P.O. Box 472
Rockdale, Texas 76567

Re: Visual Site Inspection
Aluminum Company of America
EPA ID No. TXD008091712

Dear Mr. Saxton

The purpose of this letter is to introduce the Planning Research Corp. (PRC) as a contractor to the United States Environmental Protection Agency (EPA) Region 6. Pursuant to the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §927, this contractor has been duly designated by the U.S. EPA to conduct a visual site inspection as part of the RCRA Facility Assessment (RFA). An RFA is required for facilities that manage hazardous waste. The objective of this evaluation is to determine whether there have been, or are likely to be, releases of hazardous waste or hazardous constituents at the facility which will require further investigation. This analysis will provide information to establish priorities for a subsequent RCRA Facility Investigation, if needed.

An integral part of the RFA is a visual site inspection to verify and determine the location of "Solid waste Management Units" (SWMUs). The term SWMU includes "any unit at the facility from which hazardous constituents might migrate, irrespective of whether the units were intended for the management of solid and/or hazardous wastes" (50 FR 28702, July 15, 1985). This definition includes container storage units; tanks; surface impoundments; waste piles; land treatment units; landfills; incinerators; underground injection wells; physical, chemical and biological treatment units; recycling units; and areas contaminated by routine and systematic discharges from process areas.

We will visit your facility for the purpose of inspecting these SWMUs. This inspection is to enable EPA to attain a technical understanding of current and historical waste flows. Photographs of each SWMU are to be taken to document conditions at the facility and the waste management procedures.

JRINEHART:5-6790:12/20/91 FILE A:B-VSLITR.2

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6H-PC

yellow

2.

PRC may require the assistance of some of your personnel in reviewing solid waste flows, associated units, and any other solid waste management information. Additional issues may be reviewed at the time of the site inspection.

The visual site inspection is scheduled for January 14 & 15, 1992. If you have any further questions, please contact Jon Rinehart at (214) 655-6790.

Sincerely yours,

William K. Honker, P.E.
Chief
RCRA Permits Branch

Enclosure

cc: Steve Phillips
Minor Hibbs
TWC

PRC Environmental Management, Inc.
1 Dallas Centre
350 North St. Paul Street
Suite 2600
Dallas, TX 75201
214-754-8765
Fax 214-922-9715



December 18, 1991

Mr. Jon Rinehart
U.S. EPA Region VI
1445 Ross Avenue
Suite 1200
Dallas, TX 75202

Re: EPA Contract No. 68-W9-0041
Work Assignment 041R264409
Lists of Potential Solid Waste Management Units

Dear Mr. Rinehart:

Enclosed is the preliminary list of potential solid waste management units and general facility questions for the Aluminum Company of America (TXD008091712) facility in Rockdale, Texas, to be inspected by PRC on January 14 and 15, 1992.

A draft transmittal letter notifying the facility about the planned visual site inspection has also been included for your reference.

If you have any questions or comments, please contact me at (214) 754-8765.

Sincerely,

John S. Gray
Contractor Project Manager

JSG/mcb

enclosure

cc: Steve Phillips - PRC, Dallas
File





December 17, 1991

Mr. E. Brooks Parker
Environmental Superintendent
Aluminum Company of America
P.O. Box 472
Rockdale, Texas 76567

Re: RCRA Facility Assessment Visual Site Inspection
EPA ID No. TXD008091712

Dear Mr. Parker:

In preparation for the visual site inspection (VSI) to be conducted at the Aluminum Company of America (ALCOA) facility on January 14 and 15, 1992, you will find the enclosed list of potential solid waste management units (SWMU) to be inspected by PRC Environmental Management, Inc. (Attachment A).

The purpose of the VSI are as follows:

1. Identify SWMUs.
2. Assess the potential for release of hazardous constituents from SWMUs and other areas of concern.
3. Evaluate the need for further action.

PRC conducted a review of file materials available from the U.S. Environmental Protection Agency (EPA) Region 6 before developing the enclosed attachments. The file review included Resource Conservation and Recovery Act (RCRA) documents, Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) documents, and general correspondence. The principal sources of information used for this preliminary list were RCRA Part A Permit Applications and subsequent revisions. Compliance Evaluation Inspections were also relied upon to identify potential SWMUs and other areas of concern.

The inspection team will need to see the potential SWMUs and areas of concern identified in Attachment A during the site visit. Because the list of SWMUs is based upon a review of file information which may not be complete, ALCOA should address the prepared request for general information (Attachment B) before the site investigation. The inspection team will revise the list of SWMUs based on your responses and the site inspection. A fact sheet will be prepared by the inspection team for each SWMU as shown in Attachment C. Your cooperation and assistance in compiling this information will expedite the inspection process.



Mr. Parker
Page 2
December 19, 1991

Members of the inspection team will be as follows:

PRC Environmental Management, Inc. - Tim Oliver
PRC Environmental Management, Inc. - John Hoffelt
PRC Environmental Management, Inc. - Gary Benfield

If you have any questions, please contact me at (615) 256-1191.

Sincerely,

EPA WAM

XXX/xxx

attachments

cc: John Gray - PRC, Dallas
File

ATTACHMENT A
ALUMINUM COMPANY OF AMERICA
ROCKDALE, TEXAS
(TXD008091712)

POTENTIAL SOLID WASTE MANAGEMENT UNITS

SWMU Number	Identification of Potential SWMUs
1	Inactive Spent Potlining Disposal Area
2	Active Spent Potlining Disposal Area
3	Future Spent Potlining Disposal Area
4	Building 144 Spent Solvent Treatment Tank
5	Indoor Spent Solvent Storage Facility
6	Indoor Spent Potlining Storage Facility
7	South Yard Spent Solvent Treatment Tank
8	IGC Fuel Office Spent Solvent Treatment Tank
9	Leachate Evaporator
10	250,000 Gallon Storage Tank
11	7,000 Gallon Storage Tank
12	Hydrolysis Unit
13	Spent Potlining Waste Pile (300CY)
14	Spent Potlining Waste Pile (26,000 CY)
15	8,000 Gallon Underground Storage Tank
16	Pot Washing Station
17	Spent Potlining Crusher
18	28,000 Gallon Storage Tank
19	5,000 Gallon Processing Tank
20	Lined Pits (3)
21	Unlined Pits (1)
22	PCB Transformer Storage Area
23	2,000 Gallon Waste Oil Underground Storage Tank

ATTACHMENT B

ALUMINUM COMPANY OF AMERICA ROCKDALE, TEXAS (TXD008091712)

REQUEST FOR ADDITIONAL FACILITY INFORMATION PRIOR TO THE VISUAL SITE INSPECTION

1. Provide a current map (site plan), and locate all listed potential solid waste management waste units (SWMUs). For each SWMU identified, provide all information of each as requested on Attachment C.
2. Provide detailed information on the present function of the ALCOA facility. For example, what does ALCOA presently manufacture? What facilities are active? What wastes, hazardous or nonhazardous, are currently generated? What quantities? Provide a brief narrative for each process, and provide process flowsheets for the active units.
3. Provide current drawings that show engineering design and associated secondary containment of container storage areas, train car docking areas, surface impoundments, aboveground and belowground storage tanks, or other facility and equipment areas used to handle or dispose of hazardous and nonhazardous wastes.
4. Describe the operations at the electric power plant. Include process flow description, a description of the fuel used, and pollution control practices at the facility.
5. Please provide a full description of the processes and units associated with the following Texas Air Control Board Permits and any other air discharges at the facility.

• C - 7804	• R - 2158
• C - 7559	• R - 2786
• R - 804	• R - 4476
• R - 454A	• S - 17673
• R - 9465	• R - 4612
6. Please provide any current or historical aerial photographs of the facility that are available.
7. Provide any current and historical information concerning any on-site spills or leaks (liquid, solid, or vapor phases) that have occurred at the facility. This should include any equipment and areas used to handle raw materials, products, and waste.
8. Provide information on the installation dates, contents, size, composition (steel, fiberglass), testing results, abandonment, removal, closure, and sampling data for all underground storage tanks associated with the facility.

9. Describe the processes and waste management procedures associated with the following hazardous wastes. This should include, but not be limited to, containment, storage practices, disposal, and treatment procedures. Also provide a complete description of each waste and waste analyses, if available.
- SPL Leachate Concentrate (K088)
 - Paint Thinner (F003/F005)
 - Spent Solvents (F001/F002)
 - Spent Solvents (D001)
 - 1,1,1 - Trichloroethane Waste (F001)
 - Potlining Material (K088)
 - SPL Leachate (K088)
 - SPL Leachate Evaporator Residue (K088)
10. Provide any geologic or monitoring information associated with the 13 water wells identified in the August 14, 1980 Notification of Hazardous Waste Activity. Also identify any additional wells located in the vicinity of the facility and information regarding water use in the area.
11. Please provide a copy of the facility's NPDES Permit (TS0000876) and any monitoring information available.
12. Please provide a copy of the facility's Texas Department of Water Resources Permit (WQ0000395), and any monitoring information available.
13. Please provide, if available, information regarding the use of Alcoa Lake and other surface water bodies in the area.
14. Please provide information regarding the facility's Surface Mining Division Railroad Commission of Texas Permit (001). Describe any wastes generated by these operations and their disposition.
15. Provide information regarding the spill of cyanide salt to Wegua Creek on August 4, 1986. Describe the sources of cyanide at the facility and any other spills that have occurred at the facility.
16. Describe any continuing use of lubricants containing lead at the facility, as described in the facility's 1985 Biennial Report.
17. Please provide information regarding the facility's Clean Water Act Section 404 Dredge and Fill Permits (SPGP8600263B).

18. Please provide a copy of the Contamination Remedial Plan (10/22/85) and Post Closure Plan and Groundwater Monitoring Program (7/24/86). Information on monitoring wells, monitoring data, and remedial actions taken at the facility should be included.
19. Please provide a copy of the facility's Part B permit application if one has been prepared.

ATTACHMENT C

**ALUMINUM COMPANY OF AMERICA
ROCKDALE, TEXAS
(TXD008091712)**

POTENTIAL SOLID WASTE MANAGEMENT UNITS (SWMU)

Number:	(SWMU No.)
Name:	(Identification of SWMU)
Unit Characteristics:	(General description, including location, dimensions, SWMU components, construction material, and secondary containment)
Operational History:	(Dates of operation and any operational permits or permit applications)
Current Status:	(Active, inactive, physically closed, approved closed, or certified closed)
Waste Characteristics:	(Description of types, volumes, and hazardous or nonhazardous characteristics of waste media)
Waste Management:	(Description of handling treatment, storage, and disposal practices; include names and addresses of disposal facilities used)
Release History:	(Visual evidence or reports of releases of hazardous material; include associated dates and any regulatory actions performed)
Potential Pathways:	(Potential migration pathways, such as air, surface water, ground water, soil, or subsurface gas)
Exposure Potential:	(Location and use of nearby water wells, surface water, and other potential human and environmental receptors of releases)
Remedial Action:	(Description of any remedial action performed because of past releases; include dates and types of remediation performed, and waste media disposition)

ALUMINUM COMPANY OF AMERICA

P.O. BOX 472

ROCKDALE, TEXAS 76567

RECEIVED

1991 MAY -3 AM 10: 29

EPA REGION 6
HAZARDOUS WASTE
COMPLIANCE BRANCH



April 30, 1991

Mr. David Neleigh
Chief, Texas Section RCRA Permits Branch (6H-PT)
U.S. Environmental Protection Agency, Region 6
1448 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Dear Sir:

Re: Hazardous Waste Fuel Activity Notification

In response to your letter dated April 26, 1991, on above subject, this is to inform you that the Aluminum Company of America's plant near Rockdale, Texas, does not burn, and has no plans to burn, hazardous waste in boilers and industrial furnaces.

Also, the address label shows the name of Brooks Parker who has retired. Please get that name changed to James C. Saxton.

Very truly yours,

A handwritten signature in cursive script that reads 'C. L. Green'.

C. L. GREEN
Texas Area Environmental Manager

CLG:ak

Copy: G. H. Lantz/J. C. Saxton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75202-2733

April 26, 1991

ALUMINUM COMPANY OF AMERICA
PARKER BROOKS ENVISOPV
PO BOX 472
ROCKDALE TX 75557

Re: Hazardous Waste Fuel Activity Notification

Dear Sir:

The Administrator of the Environmental Protection Agency (EPA) signed a new regulation under the Resource Conservation and Recovery Act (RCRA) governing the burning of hazardous waste in boilers and industrial furnaces (BIF rule). This rule was published in the Federal Register on February 21, 1991.

Owners and operators of boilers and industrial furnaces who have not previously notified EPA of their hazardous waste fuel activities must submit a Notification of Regulated Waste Activity (Form 8700-12, dated 7/90) to EPA pursuant to RCRA section 3010 within three months of publication of the final rule.

Facilities with boilers and industrial furnaces burning hazardous waste fuels have already been required to notify EPA of their hazardous waste fuel activities under 40 CFR 222.35. We urge you to submit or update the section 3010 notification for your facility by May 21, 1991, if applicable.

Also, please notify me by the same date if you do not intend to burn hazardous waste, intend to cease burning hazardous waste or plan to claim an exemption from the BIF rule.

Your cooperation is appreciated. If you need further assistance, please call Mr. Ruben Casso of my staff at (214) 655-6785.

Sincerely yours,


David Neleigh
Chief

Texas Section
RCRA Permits Branch (6H-PT)